

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 7068
APPLICANT NAME: City of Los Angeles
PROJECT TITLE: Upper Los Angeles River Watershed IRWMP

FUNDS REQUESTED: \$ 49,995,950
COST MATCH: \$246,556,806
TOTAL PROJECT COST: \$296,552,756

DESCRIPTION: The IRWM program being developed for the Upper LA River Watershed is integrating opportunities for park and open space, especially in the most disadvantaged communities; installing non-point source BMPs for stormwater management and making the water available for re-use; creating wetlands to capture and clean runoff and create habitat; restoration of native habitat; and providing educational opportunities for over 250,000 schoolchildren. Projects were selected to cover a broad geographical spectrum, but primarily targeting those communities with the greatest need. At the same time, these projects have a groundswell of support; most have been desired by stakeholders for many years.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Pass

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1. 1

Applicant does not have an adopted IRWMP and the application does not include a schedule of adoption except for a statement that it will be adopted by January 1, 2007.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1. 3

The boundaries of the region are unclear. It is unclear if the region includes just the Upper Los Angeles River or if it also includes the lower watershed as implied by inclusion of a project from south Los Angeles. The applicant does provide various maps, none of which resolve the boundary issue. Maps show land uses, water bodies, cities, soil infiltration rates, and social and cultural makeup. There is a brief discussion of water quality and quantity issues but further discussion on how this IRWMP would address projected increased water demands is needed. The current and future water resources of the region are not addressed fully, especially in terms of quantity. Demand projections are provided for one city but not the whole region. Important ecological processes, cultural values, and economic trends are not sufficiently discussed.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1. 3

The applicant includes some management objectives from Proposition 50 and stakeholder objectives into the IRWMP. A number of plans and studies with objectives consistent with IRWM objectives are listed for various parts of the region, but these are yet to be consolidated into a set of regional objectives. Rather, the discussion in the IRWMP focuses on the strategy to be used to build a wide variety of interests into the objectives for the Final IRWMP.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1. 3

This portion of the IRWMP is confusing and there does not seem to be integration of strategies. The applicant takes water management strategies from the Guidelines and presents which local plans incorporate such strategies. While this is a necessary analysis in plan development, it does not fully address the integration of strategies or the benefits of integration. The applicant does not discuss directly how all or some of these management strategies work together to achieve common objectives. When a particular water management strategy is not applicable, the reasons are clearly stated. The applicant states that integration of regional objectives and management strategies is an area that still needs improvements which would take place in future updates to the IRWMP.

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Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.

3

Regional priorities are not defined. No short- or long-term regional priorities are given. A short discussion on how decision making will be responsive to regional changes and project sequencing is provided in Section 7 of the IRWMP. The project prioritization is based on the IRWMP Grant Program criteria. While this may be a useful step in project prioritization, a regional strategic and logistic element is missing in this method.

Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

2

Appendix E to the IRWMP is the collection of project submission forms and scores. This does not demonstrate how the IRWMP would be implemented. It is not clear if the IRWMP would be considered implemented if all projects were to be executed according to their numerical priority. Timelines for individual projects and responsible agencies for projects are identified in the project submittal forms. Linkages and project interdependencies are not part of the IRWMP. The institutional structure that will implement the IRWMP is not discussed. There was minimal discussion about the economic and technical feasibility of the projects and the proposal itself.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

2

The IRWMP does not include an evaluation of IRWMP benefits and impacts. Instead, the impacts and benefits are treated on a project-by-project basis within the internal project submittal forms used to solicit projects from participating agencies. Any potential benefits to DACs are mentioned in question 4 of these forms on a project-by-project basis and are not summarized from an integrated regional approach. There is no discussion of the potential negative impacts that may occur with this proposal or how they would be avoided. It is not clear that implementation of the IRWMP would provide advantages over implementing separate local plans. Interregional benefits and impacts are to be discussed in the final IRWMP.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

2

The project submittal forms have comments pertaining to technical analysis and plan performance. For most of the projects, the applicant states that water quality will be monitored and some form of a report will be compiled, but no specifics are given. There was no mention of data, technical methods, analysis, or potential data gaps. The IRWMP does not discuss any ways in which these projects and plans would be evaluated and what is presented on the project submittal forms is often very general. The applicant states that the final IRWMP would attempt to address plan performance as opposed to project performance.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

2

Data management is discussed separately for each project and it is difficult to determine which of these projects address statewide data needs or if there are any existing monitoring plans for both water supply and water quality. There is no mention of data management in the IRWMP other than on the project submittal forms. The applicant states that all data will be made available at the Los Angeles storm water website, but other than this website, there is not an integrated data management strategy or way in which the information will be disseminated. The IRWMP does not propose to produce documents or reports that would summarize the progress and successes of the various projects. There is no obvious mention of SWAMP requirements. The IRWMP does not provide the implementation structure for data management or identify a single organization responsible for posting data.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

3

Individual project submittal forms contain budget information and the applicant also provides a paragraph of information on other grant funds used in the area. The IRWMP does not directly address financing for plan implementation or ongoing support and financing of project O&M. Clearer regional treatment of financing and other aspects of the IRWMP are needed in the final IRWMP.

Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

3

Section 2 of the IRWMP summarizes local planning documents that address water management. Table 2-1 compares each plan or study to the required elements of an IRWMP. The applicant does not relate each of the proposed projects to any of the major planning documents within the region nor to the IRWMP itself. The only way these projects are related to each other within the IRWMP is in this table. The relationship between the IRWMP and local plans is not discussed. The IRWMP does not discuss coordination with local land use decision makers.

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Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

2

The IRWMP includes an objective to coordinate planning among diverse stakeholders with some strategies that may be employed to achieve the objective. There is no discussion about who the major stakeholders are or how they were chosen. The internal project submittal forms do have some information about stakeholders for each project. The indication is that there is a loose arrangement for stakeholder involvement at the regional level. However, the IRWMP does not present a unified process for stakeholder involvement in the planning process. Apart from the map showing location of DACs in the region, nothing else is said about their involvement in the process and environmental justice concerns are not mentioned. Possible obstacles to plan implementation are not identified and coordination with State or federal agencies is not discussed.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Pass

Question: Description of Proposal. Weighting factor is 3.

12

The description of projects was more general than specific. The inclusion of tasks for each project would have helped the reviewer understand the projects in the proposal. Specific storm water treatment processes are never specified. The applicant uses statements, such as "perfect efficiency", without defining them. The applicant includes a description of the proposal and the goals of the IRWMP, but with a lack of coordination among projects, particularly in relation to data tracking and measurement of project success. The proposal does incorporate more than one of the eligible water management elements found in the Guidelines. There is a description of the water body, water quality problems, and applicability to the RWB Watershed Management Initiatives. The applicant discusses multiple benefits from the proposed projects. The discussion of scientific basis for a number of the proposed projects is not well documented.

Question: Project Prioritization. Weighting factor is 2.

8

The projects in the proposal are the result of a prioritization process conducted by the applicant that was based on the IRWMP standards for this grant program. Prioritization of projects from within the region appears to be missing. However, in Attachment 6, the applicant does describe how some of the projects fit into regional priorities such as working on the upper portion of the watershed to relieve flood potential down stream. In general the high priority projects included in this proposal have good linkage to the IRWMP. No priorities among the ten proposed projects are discussed. The applicant needs to prioritize these projects amongst themselves and provide this information in the final IRWMP.

Question: Cost Estimate. Weighting factor is 1.

4

The applicant supplies a cost estimate showing proposal costs as well as project costs. The budgets for a few of these projects require more narrative details explaining the large cost associated with each. Reasonableness is difficult to evaluate because the project descriptions are general. All costs are clearly listed in a table, but the costs for construction/implementation seem high for the types of projects proposed. For example, the Strathern Pit Multiuse Project is essentially a detention basin and its cost of \$7.8 million seems high for construction/implementation of this type of BMP. It is also not obvious what "included" means under contingency. It appears to mean that contingencies are built into the budget estimates, but it is unclear why some projects include contingencies and some do not.

Question: Schedule. Weighting factor is 1.

4

The applicant provided a schedule for each proposed project for the next 8 years. Each project appeared to have realistic time frame and implementation will begin for most in the second quarter of 2006, which allows for adequate comment time and funding opportunities. Each project schedule appears complete and shows implementation of the project, including post-construction implementation and monitoring. No other related elements of the IRWMP are scheduled. Although other projects are proposed, they are still under consideration and are not scheduled.

Question: Need. Weighting factor is 2.

8

The applicant gave a summary of the needs of the region and how each specific project will address those needs. There is a much heavier emphasis on discussing needs on a project-by-project basis than discussing the need for the proposal as a whole. Each project appeared to address different concerns within the community and the region. There is no discussion of critical negative impacts. There is no direct discussion as to how the need for the proposal was related to economic, environmental, or fiscal impacts.

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Question: Disadvantaged Communities. Weighting factor is 2.

8

Six of the 10 projects are taking place in DACs. The applicant is not requesting a waiver of match funds and many of the project goals are directed at DACs. There is no detailed description or summary of how each project will provide a direct benefit to a DAC. The percentage of DAC population compared to the region's population is not given.

Question: Program Preferences. Weighting factor is 1.

3

Although many program preferences are met, it is not clear that the proposal contains projects that will collectively result in regional water supply reliability and contribute expeditiously and measurably to the long-term attainment and maintenance of water quality standards. Many of the groundwater management and recharge projects will not meet the groundwater project preference. The projects provide multiple benefits.

TOTAL SCORE: 76